

5. McBee pushed the call box at the end of the driveway of the gated property and spoke with an unknown female that he was there to serve papers on Defendant. See Aff. McBee ¶¶ 3-4. However, the female did not respond and/or open the gate to the property. Id.

6. McBee returned to the property several times on July 27, 2022, but was not let into the gated property. See Aff. McBee ¶ 5.

7. Since McBee could not access the property and no one would answer the call box to let him into the property, McBee attempted to find a different address listed for Defendant, but was unsuccessful. See Aff. McBee ¶ 8.

8. McBee attempted to call Defendant at his phone number listed as 865-694-9919, and left voicemails, but did not receive a call back. See Aff. McBee ¶¶ 7, 9.

9. As of the date of filing this Response, Frankenmuth has made a good faith effort in attempting to locate Defendant. Frankenmuth has filed a Return of Service, stating that Defendant has been unlocated. See Doc. 7.

10. Frankenmuth has recently been able to locate one other address for Defendant at 240 Boling Road, Seymour, Tennessee 37865.

11. Frankenmuth has filed an alias summons, which has been issued, and is attempting to serve Defendant at this address. See Docs. 8 and 9.

12. Therefore, Frankenmuth respectfully requests this Honorable Court extend the time for service of Defendant by 60 days in order to allow Frankenmuth to properly serve Defendant.

Respectfully submitted,

s/ Hannah J. Leifel

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of September, 2022, a true and correct copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U. S. Mail. Parties may access this file through the court's electronic filing system.

Lance E. Blair d/b/a Legacy Construction
622 Admiral Farragut Drive
Seymour, TN 37865

s/ Hannah J. Leifel

HANNAH J. LEIFEL

EXHIBIT 1

5. Over the next several hours, I returned to the property several times, but received no reply. On one attempt, I saw the neighbor across the street and I asked him if he knew who live across the street. He stated that he did not, but that they always park in the garage.

6. In addition, I asked another neighbor and she stated that she did not know who lived there, but has never seen any vehicles used for construction there.

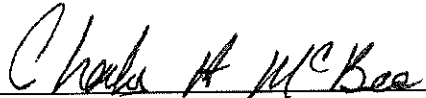
7. Subsequently, I left the property and went to a convenience store and tried to locate another address or phone number. I was able to locate the telephone number 865-694-9919, which I left a voicemail and received no call back.

8. I also found an address of 2515 Middlebrook Ridge Ln, Knoxville, Tennessee, which was the previous address for Defendant. After searching property records, I was unable to find any address owned by Lance Blair or his possible wife, Vanessa, in Knox county or any other county.

9. On July 28, 2022, I called the telephone number again, but received no reply.

10. As of the date of this affidavit, I have been unable to locate and serve Defendant.

FURTHER AFFIANT SAITH NOT.


CHARLES A MCBEE

STATE OF TENNESSEE)

COUNTY OF Knox)

Personally appeared before me, the undersigned, a Notary Public, in and for said county and state, the within named Charles A McBee, with whom I am personally acquainted (or upon the basis of satisfactory evidence presented to me), who, after being duly sworn, made oath that he executed the foregoing for the purposes therein contained.

WITNESS my hand and official seal this 26th day of September, 2022.

My Commission Expires:

4/29/2026

